

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

WESTERNGECO L.L.C.,

Plaintiff,

V.

**ION GEOPHYSICAL CORPORATION,
FUGRO-GEOTEAM, INC.,
FUGRO-GEOTEAM AS,
FUGRO NORWAY MARINE SERVICES
AS, FUGRO, INC., FUGRO (USA), INC. and
FUGRO GEOSERVICES, INC.,**

Defendants.

CIVIL ACTION NO. 4:09-cv-01827

Judge Keith P. Ellison

Jury Trial Demanded

VERDICT

QUESTION 1 – DIRECT INFRINGEMENT – METHOD CLAIMS

Did WesternGeco prove by a preponderance of the evidence that Fugro-Geoteam sold or offered to sell in the United States a process that infringed any of the patent claims below under § 271(a)?

Check “Yes” or “No” as to each claim.

‘520 Patent:

Claim 1: Yes ___ No ___

Claim 2: Yes ___ No ___

Claim 6: Yes ___ No ___

‘967 Patent:

Claim 1: Yes ___ No ___

‘607 Patent:

Claim 1: Yes ___ No ___

Answer Question 2 only for those claims for which you answered “Yes” in Question 1. If you did not answer “Yes” for a claim in Question 1, do not answer Question 2 as to that claim.

QUESTION 2 – INDUCED INFRINGEMENT – METHOD CLAIMS

Did WesternGeco prove by a preponderance of the evidence that ION actively induced the direct infringement of the patent claim?

Check “Yes” or “No” as to each claim.

‘520 Patent:

Claim 1: Yes ___ No ___

Claim 2: Yes ___ No ___

Claim 6: Yes ___ No ___

‘967 Patent:

Claim 1: Yes ___ No ___

‘607 Patent:

Claim 1: Yes ___ No ___

Answer Question 3 only for those claims for which you answered “Yes” in Question 1. If you did not answer “Yes” for a claim in Question 1, do not answer Question 3 as to that claim.

QUESTION 3 – CONTRIBUTORY INFRINGEMENT – METHOD CLAIMS

Did WesternGeco prove by a preponderance of the evidence that ION contributed to the direct infringement of the patent claim?

Check “Yes” or “No” as to each claim.

‘520 Patent:

Claim 1: Yes ___ No ___

Claim 2: Yes ___ No ___

Claim 6: Yes ___ No ___

‘967 Patent:

Claim 1: Yes ___ No ___

‘607 Patent:

Claim 1: Yes ___ No ___

QUESTION 4 – INFRINGEMENT UNDER SECTION 271(F)(1) – SYSTEM/APPARATUS CLAIMS

Did WesternGeco prove by a preponderance of the evidence that either of the Defendants infringed a claim of any of the patents listed below under Section 271(f)(1)?

Check “Yes” or “No” for each of the listed claims for each Defendant.

ION:

Fugro-Geoteam:

‘520 Patent:

Claim 19:

Yes ___ No ___

Yes ___ No ___

Claim 23:

Yes ___ No ___

Yes ___ No ___

‘967 Patent:

Claim 15:

Yes ___ No ___

Yes ___ No ___

‘607 Patent:

Claim 15:

Yes ___ No ___

Yes ___ No ___

‘038 Patent:

Claim 14:

Yes ___ No ___

Yes ___ No ___

QUESTION 5 – INFRINGEMENT UNDER SECTION 271(F)(2) – SYSTEM/APPARATUS CLAIMS

Did WesternGeco prove by a preponderance of the evidence that either of the Defendants infringed a claim of any of the patents listed below under Section 271(f)(2)?

Check “Yes” or “No” for each of the listed claims for each Defendant.

ION:

Fugro-Geoteam:

‘520 Patent:

Claim 18:

Yes ___ No ___

Yes ___ No ___

Claim 19:

Yes ___ No ___

Yes ___ No ___

Claim 23:

Yes ___ No ___

Yes ___ No ___

‘967 Patent:

Claim 15:

Yes ___ No ___

Yes ___ No ___

‘607 Patent:

Claim 15:

Yes ___ No ___

Yes ___ No ___

‘038 Patent:

Claim 14:

Yes ___ No ___

Yes ___ No ___

QUESTION 6 – INVALIDITY

Do you find by clear and convincing evidence that the claims listed below are invalid for any of the reasons listed below?

Check “Yes” or “No” for each theory of invalidity for each claim. Checking “Yes” means that the claim is invalid for that reason. Checking “No” means that the claim is not invalid for that reason.

‘520 Patent:**Claim 1:**

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 2:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 6:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 18:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 19:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 23:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

*(Invalidity Question Continued)***'967 Patent:****Claim 1:**

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 15:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

'607 Patent:**Claim 1:**

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Claim 15:

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

'038 Patent:**Claim 14:**

Anticipation	Yes ___ No ___
Obviousness	Yes ___ No ___
Written Description	Yes ___ No ___
Indefiniteness	Yes ___ No ___
Best Mode	Yes ___ No ___
Enablement	Yes ___ No ___

Answer Question 7 as to ION if there are claims for which you answered “Yes” in response to Questions 2, 3, 4, or 5 for ION (or for which the court has previously found infringement), and for which you also answered “No” for each ground for invalidity as to that claim in response to Question 6. Otherwise, do not answer Question 7 as to ION.

Answer Question 7 as to Fugro-Geoteam if there are any claims for which you answered “Yes” in response to Questions 1, 4, or 5 for Fugro-Geoteam (or for which the court has previously found infringement), and for which you also answered “No” for each ground for invalidity as to that claim in response to Question 6. Otherwise, do not answer Question 7 as to Fugro-Geoteam.

QUESTION 7 – WILLFUL INFRINGEMENT

Did WesternGeco prove by clear and convincing evidence that either of the Defendants willfully infringed a valid and enforceable patent claim because the Defendant actually knew, or it was so obvious that it should have known, that its actions constituted infringement of a valid and enforceable patent claim?

Check “Yes” or “No” for each Defendant.

ION: Yes ___ No ___

Fugro-Geoteam: Yes ___ No ___

As to each Defendant, answer Question 8 if there are claims for which you answered “yes” in response to Question 1, 4, or 5 (or for which the court has previously found infringement) and for which you also answered “no” in response to Question 6. Otherwise, do not answer Question 8.

DAMAGES

QUESTION 8 – LOST PROFITS

What lost profits, if any, did WesternGeco prove by a preponderance of the evidence that it suffered as a result of the direct infringement, if any, due to a sale by Fugro-Geoteam of a process that infringed a valid and enforceable method claim within the United States?

Any amount found should be written in dollars and cents. Do not include in your answer any amount of lost profits that resulted from the infringement of a claim you found invalid in response to Question 6.

Answer: _____

What lost profits, if any, did WesternGeco prove by a preponderance of the evidence that it suffered as a result of infringement, if any, under Section 271(f) of a valid and enforceable patent claim?

Any amount found should be written in dollars and cents. Do not include in your answer any amount of lost profits that resulted from the infringement of a claim you found invalid in response to Question 6.

ION: _____

Fugro-Geoteam: _____

As to each Defendant, answer Question 9 only if there are claims for which you answered “yes” in response to Question 1, 4, or 5 (or for which the court has previously found infringement) and for which you also answered “no” in response to Question 6. Otherwise, do not answer Question 9.

QUESTION 9 – REASONABLE ROYALTY

For those acts of direct infringement under Section 271(a) for which WesternGeco has not proved its entitlement to lost profits, what has WesternGeco proved based on a preponderance of the evidence it is entitled to as a reasonable royalty, if any?

Any amount found should be written in dollars and cents. Do not include in your answer any amount of reasonable royalty attributable to a claim you found invalid in response to Question 6.

From Fugro-Geoteam: _____

If an amount was found, what reasonable royalty rate did you apply? _____

For those acts of infringement under Section 271(f) for which WesternGeco has not proved its entitlement to lost profits, what has WesternGeco proved based on a preponderance of the evidence it is entitled to as a reasonable royalty, if any?

Any amount found should be written in dollars and cents. Do not include in your answer any amount of reasonable royalty attributable to a claim you found invalid in response to Question 6.

From ION: _____

If an amount was found, what reasonable royalty rate did you apply? _____

From Fugro-Geoteam: _____

If an amount was found, what reasonable royalty rate did you apply? _____

For the Jury:

By: _____
Foreperson

Date: _____